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FILED

OCT 10 2024

U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

6 *Pro Se PG&E Fire Victim Claimant and Party to related proceedings before the California Public*
7 *Utilities Commission*

9
10 **UNITED STATES BANKRUPTCY COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

13 In re:

14 PG&E CORPORATION,

15 -and-

16
17 PACIFIC GAS AND ELECTRIC
18 COMPANY,

19 Debtors.

- 20 ☐ Affects PG&E Corporation
21 ☐ Affects Pacific Gas and Electric Company
22 ☒ Affects both Debtors

23 * *All papers shall be filed in the lead case,*
24 *No. 19-30088 (DM)*
25
26
27
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Bankr. Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administrated)

**WILLIAM B. ABRAMS STATEMENT
IN SUPPORT OF FAIRNESS FOR
FIRE VICTIMS AND OPPOSING THE
ASSOCIATED
MISREPRESENTATIONS AMONG
TRUST OVERSIGHT COMMITTEE
MEMBERS AND OTHERS ON CORE
COMMITTEES THAT UNDERMINE
VICTIM SETTLEMENTS AND THE
JUST TREATMENT OF FIRE
VICTIMS WITHIN THIS CASE**

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The Fire Victim Trust (“FVT”) Trustee has communicated to PG&E victims that if the FVT is not infused with additional monies, victims will only be paid ~75% of their settlements. Following, it is reasonable to consider that there are only two ways currently being pursued and/or supported by the Trustee and TOC Members to make up this shortfall and to make good on the “made whole” commitments to victims. These remaining last-ditch remedies include (1) the successful resolution of PG&E derivative cases where certain attorneys serving on the TOC have taken positions adverse to the interests of victims¹ and (2) reliance upon “Fairness for Fire Victims” efforts to lobby and legislatively restore victim’s rights to access the California Wildfire Fund.

¹ See “Exhibits to Support Motion of William B. Abrams Pursuant to Federal Rule of Bankruptcy Procedure 2004 for Entry of an Order Authorizing Discovery and Trust Compliance with Court Orders” [Dkt. 14559]

1 more scrutiny now when these same individuals are once again forming a “grassroots nonprofit” to
2 advance the interests of victims to be 100% made whole.

3 BACKGROUND

4 Abrams filed motions to reconstitute the PG&E Fire Victim Trust (“FVT”) Oversight
5 Committee to promote the just and fair treatment of PG&E Fire Victims. These papers included the
6 “William B. Abrams Motion for Just Treatment of Victims Through the Reconstitution of the Fire
7 Victim Trust Oversight Committee and Equitable Application of the Judicial Review Provisions
8 Pursuant to U.S.C. §§ 1123(A)(4)” [Dkt. 8247] and the “William B. Abrams Motion to Enforce the
9 Victim Trust Agreement and Replace All Members of the Fire Victim Trust Oversight Committee and
10 to Support Efficient Trust Administration Pursuant to U.S.C. §§ 1123(A)(4) and Fire Victim Trust
11 Agreement Section 6.2” [Dkt. 10748]. Within these papers Abrams noted that the “*Trust Oversight*
12 *Committee (TOC) was constituted in a manner with clear conflicts of interest and self-dealing which*
13 *are in direct violation of their fiduciary duties.*” Within these papers and others, Abrams provided
14 evidence that Members of the Trust Oversight Committee, Members of the Tort Claimant Committee
15 and Fire Claimant Professionals formed the “Up From the Ashes Coalition” (the “UFTA”) which was
16 instrumental in **excluding victims from the California Wildfire Fund**. This nonprofit organization
17 was dissolved after the International Brotherhood of Electrical Workers (“IBEW”) filed official
18 complaints accusing the organization of “shadow lobbying” and violations of lobby laws.
19 Subsequently, and despite knowledge of these facts, the Trustee and Trust Oversight Committee hired
20 the same individual that led that organization to lead lobbying activities on behalf of the Fire Victim
21 Trust until such time as he was accused of unrelated sexual misconduct. Are these same core parties
22 within this case now leveraging similar tactics and funding to support a new “nonprofit” organization?

23 STATEMENT

24 Fire Victim Trust Oversight Committee Members and other attorneys serving on core
25 committees within this Case have indicated that they formed, funded and otherwise support a
26 “nonprofit” organization called “Fairness for Fire Victims” with the welcome and righteous goal of
27 getting victims 100% made whole. This organization established the internet presence
28 “firefairness.org” and subsequently presented itself as a “nonprofit” within social media sites
including on Facebook which asks victims, public officials and other organizations to support a

1 “simple” fix so that victims will be made 100% whole (*See Exhibit A*).² They have solicited
2 donations and claim to be engaged with their supporters in lobbying activities to amend AB1054 so
3 that the California Wildfire Fund may be accessed to infuse the FVT and make up the considerable
4 shortfall. Abrams is unaware if the individuals hired by this organization have sponsored legislation,
5 attended legislative hearings or otherwise engaged in any public activities to support these laudable
6 goals for victims. **Abrams is similarly unaware if the core attorneys within this case supporting**
7 **this nascent “nonprofit” are actively seeking these financial remedies to the FVT shortfall or**
8 **simply working to improve their image after they falsely represented to victims that AB1054**
9 **was a ticket to make them whole.** Given that many of these same parties (TOC Members, TCC
10 Members, Fire Claimant Professionals) previously formed a nonprofit organization (i.e. Up From the
11 Ashes) and misrepresented their role within that nonprofit to exclude victims from the same
12 California Wildfire Fund it is certainly reasonable to question whether or not their work this time
13 around to amend AB1054 through yet another “nonprofit” (i.e. Fairness for Fire Victims) is being
14 done with honesty and integrity. As we consider these questions, it is important for the Court and
15 parties to be aware of the following three facts:

16 1. **Company NOT a Nonprofit** – According the official entity formation documents filed
17 with the California Secretary of State (“SOS”) on May 23 and May 24, 2024, “Fairness
18 for Fire Victims” was not formed as a nonprofit but as a Limited Liability **Company** (*See*
19 **Exhibit B**). The production of the official annual report required by the SOS that might
20 shed light on the ownership structure, management structure and funding sources of this
21 company has recently been delayed by the company from the previous deadline of August
22 21, 2024 to the revised due date of May 31, 2026 (*See Exhibit C*). Of course, this revised
23 date for the submittal of the annual report is well after the date when it is expected that the
24 Fire Victim Trust will wind down. Why this company would pose as a nonprofit
25 supporting PG&E Fire Victims is unclear. Their actions on behalf of the victims within
26 this Case is also unclear.

27 2. **Fairness for Fire Victims Virtual Officers** – As stated within the official documents
28 filed with the California Secretary of State, this organization was formed by Pankaj S.
Raval, Agent of the Carbon Law Group. The sole Manager/Member named within these

² See “Coalition Members” <https://www.firefairness.org/coalition>

1 papers is Thomas Brower. Abrams and many other victims are not aware of how Mr.
2 Raval or Mr. Brower are affiliated with this Case, the Trust or PG&E Wildfire Survivors
3 more broadly. More importantly, victims and the coalition members are unaware of how
4 these individuals and others are engaged in activities to support the stated “mission” of
5 this company which poses as a “nonprofit” organization. What is clear is that Mr. Raval
6 markets himself as a “Virtual General Counsel” through TikTok and other social media
7 sources.³ Abrams is unaware of why certain TCC and TOC member attorneys state that
8 they formed and support this “nonprofit” but are not publicly putting their names forward
9 as members, officers or coalition members of this organization. Perhaps when the Annual
10 Report is filed by May 31, 2026, victims will be told who is representing their interests
11 and how the activities of that organization are funded. Currently, when victims sign up as
12 coalition members, the stated Director of this organization is Mike Yates, President of
Local Teamsters 665.

- 13 **3. Fairness for Fire Victims “Virtual” Office** – According to the formation documents
14 filed with the SOS, Fairness for Fire Victims is located at “500 Capitol Mall, Suite 2350,
15 Sacramento, CA, 95814.” This “virtual office” is available through “Davinci Virtual” for
16 the low cost of \$69 per month and a one-time setup fee of \$150⁴ (See **Exhibit D**). Abrams
17 assumes that like Davinci this virtual setup is focused on painting the appearance of a
18 strong presence at our State Capitol fighting for victims to be made whole.

19 CONCLUSION

20 Abrams is confident that the Court is invested in ensuring justice for all parties including
21 PG&E victims. However, the Court should consider that a path towards justice in the dark is a
22 difficult road to travel and yet the only path seemingly afforded for victims within this case. The fact
23 that other classes of claimants (shareholders, bondholders, etc.) with an unobstructed view of the
24 negotiations on their behalf have been largely made whole and/or profited significantly from
25 settlements within this Case while victims are told to feel fortunate with scraps is proof positive that
26 sunlight matters. After our ~75% disbursement, 33% attorney fees and taxes that designate our

27 ³ See Fairness for Fire Victims “Virtual GC” at <https://www.tiktok.com/@virtualgc>

28 ⁴ See Davinci Virtual Office listing at <https://www.davincivirtual.com/loc/us/california/sacramento-virtual-offices/facility-3634>

1 recovery as “earned income,” victims and their communities will be devastated financially and
2 otherwise. Is this the judicial legacy we want to leave in the wake of this case? Indeed, the
3 exculpations, unconstitutional releases, confidentiality protocols and a lack of adherence to
4 foundational bankruptcy laws governing required disclosures will most likely mean that these
5 injustices that undermined the fabric of our communities will never see the light of day.

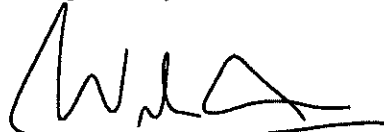
6 Here within this statement and the associated exhibits, we see that those claiming to represent
7 the interests of victims are not being forthcoming regarding who they are and what they are doing.
8 Of course, Abrams, like all other PG&E victims, hopes that “Fairness for Fire Victims,” Trust
9 Oversight Committee Members and the “Coalition Members” will work openly and collaboratively to
10 make victims 100% whole. As many individuals like Abrams and amazing organizations like After
11 the Fire USA work to support and advocate for victims, it is my hope that Fairness for Fire Victims
12 will become a meaningful partner. Certainly, victims need all the help they can get and there is room
13 for all types of organizations to further efforts for our families and our communities. Perhaps, the
14 nonprofit paperwork of Fairness for Fire Victims is in process and the company that was formed with
15 the same name and at the same time is just coincidence? Perhaps, the Annual Report will be filed
16 earlier than the 2026 target and it will demonstrate that our attorneys are engaged in laudable
17 activities on behalf of PG&E victims? Abrams and many other victims hope to learn that their fears
18 of being deceived yet again are unwarranted, but hope is not a strategy. We must learn from the prior
19 mistakes and the unwarranted trust victims placed in surreptitiously formed nonprofits that only
20 served to undermine their interests.

21 Now, the Court may take the position that these out-of-court activities as described within this
22 statement are not relevant to this case or that these statements just clog up the docket. However, the
23 evidence points to exactly the opposite view. The many influential and well-monied parties within
24 this case understood throughout this case that by simultaneously moving adjudication, legislation and
25 regulation, they could bend court decisions and processes to serve their interests. This triangulation
26 across judicial, regulatory and legislative processes paid off handsomely for these well-resourced
27 parties. On the other hand, victims including Abrams naively assumed that the Federal Bankruptcy
28 Laws and California Bar Association rules would ensure that the attorneys representing our interests
within the courtroom would not simultaneously represent opposing interests when forming
“nonprofits” and exerting influence in Sacramento and at the California Public Utilities Commission.

1 Now with rose-colored-glasses removed, Abrams once again brings these issues to the attention of
2 the Court and to core parties within this case in the hopes that this statement will bring more
3 transparency. Despite his best intentions, Abrams does understand that certain parties will continue
4 to attack the messenger, obfuscate, and work in the dark where just outcomes cannot be achieved.
5 However, hope springs eternal and Abrams along with the vast majority of PG&E Wildfire Survivors
6 and many of their attorneys that serve with integrity will continue to support the mission of Fairness
7 for Fire Victims so that PG&E victims and their communities may be made whole and recover from
8 these years of loss, tragedy and heartache. Abrams truly hopes that citizens and leaders across
9 California will further the mission of Fairness for Fire Victims and make victims and our
10 communities whole. Certainly, the core parties that represented victims within this case and the
11 clear-eyed leaders across this State know that leaving PG&E Wildfire Survivors and their
12 communities with ~75% isn't fair and it isn't justice.

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15 Executed on October 10, 2024, at Santa Rosa, CA.

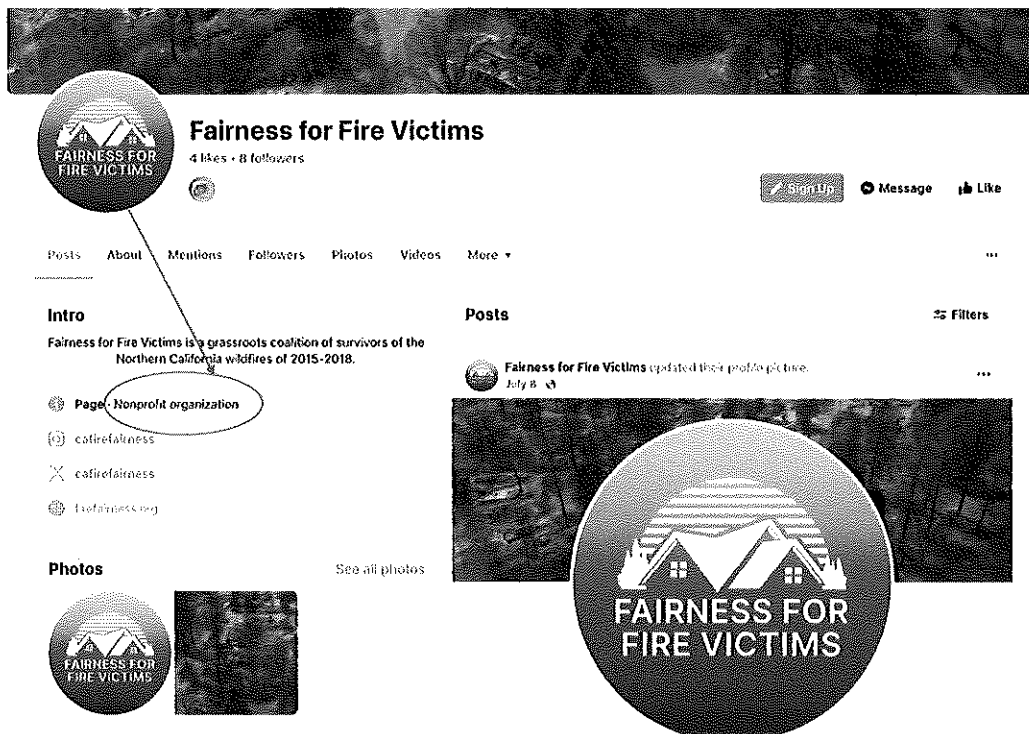
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20 Respectfully submitted,

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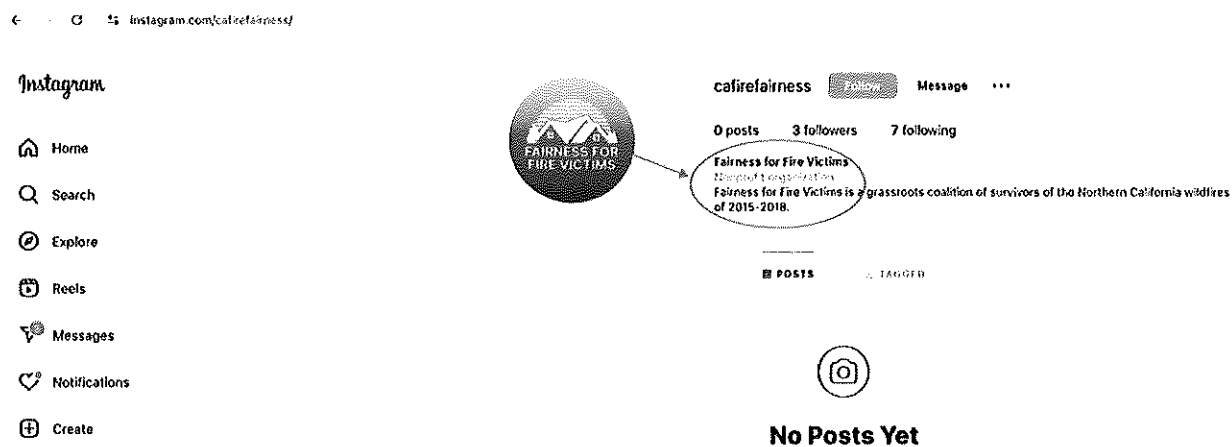
23 William B. Abrams
24 Pro Se Claimant
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EXHIBIT A: Fairness for Fire Victims “Nonprofit” Social Media

Facebook



Instagram





STATE OF CALIFORNIA
Office of the Secretary of State
ARTICLES OF ORGANIZATION
CA LIMITED LIABILITY COMPANY

California Secretary of State
1500 11th Street
Sacramento, California 95814
(916) 657-5448

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File No.: 202462412320

Date Filed: 5/23/2024

Limited Liability Company Name	Fairness for Fire Victims, LLC
Initial Street Address of Principal Office of LLC Principal Address	500 CAPITOL MALL SUITE 2350 SACRAMENTO, CA 95814
Initial Mailing Address of LLC Mailing Address	500 CAPITOL MALL SUITE 2350 SACRAMENTO, CA 95814
Attention	Thomas Brower
Agent for Service of Process California Registered Corporate Agent (1505)	CARBON LAW GROUP, A PROFESSIONAL LAW CORPORATION Registered Corporate 1505 Agent
Purpose Statement	The purpose of the limited liability company is to engage in any lawful act or activity for which a limited liability company may be organized under the California Revised Uniform Limited Liability Company Act.
Management Structure The LLC will be managed by	One Manager
Additional information and signatures set forth on attached pages, if any, are incorporated herein by reference and made part of this filing.	
Electronic Signature	
<input checked="" type="checkbox"/> By signing, I affirm under penalty of perjury that the information herein is true and correct and that I am authorized by California law to sign.	
<u>Pankaj S Raval</u> Organizer Signature	<u>05/23/2024</u> Date



STATE OF CALIFORNIA
Office of the Secretary of State
STATEMENT OF INFORMATION
LIMITED LIABILITY COMPANY

California Secretary of State
1500 11th Street
Sacramento, California 95814
(916) 657-5448

For Office Use Only

-FILED-

File No.: BA20241021241

Date Filed: 5/24/2024

B2765-6219 05/24/2024 6:18 PM Received by California Secretary of State

Entity Details	
Limited Liability Company Name	Fairness for Fire Victims, LLC
Entity No.	202462412320
Formed In	CALIFORNIA
Street Address of Principal Office of LLC	
Principal Address	500 CAPITOL MALL SUITE 2350 SACRAMENTO, CA 95814
Mailing Address of LLC	
Mailing Address	500 CAPITOL MALL SUITE 2350 SACRAMENTO, CA 95814
Attention	Thomas Brower
Street Address of California Office of LLC	
Street Address of California Office	500 CAPITOL MALL SUITE 2350 SACRAMENTO, CA 95814
Manager(s) or Member(s)	
Manager or Member Name	Manager or Member Address
+ Thomas Brower	500 CAPITOL MALL SUITE 2350 SACRAMENTO, CA 95814
Agent for Service of Process	
California Registered Corporate Agent (1505)	CARBON LAW GROUP, A PROFESSIONAL LAW CORPORATION Registered Corporate 1505 Agent
Type of Business	
Type of Business	Legislative Advocacy
Email Notifications	
Opt-in Email Notifications	Yes, I opt-in to receive entity notifications via email.
Chief Executive Officer (CEO)	
CEO Name	CEO Address
None Entered	
Labor Judgment	
No Manager or Member, as further defined by California Corporations Code section 17702.09(a)(8), has an outstanding final judgment issued by the Division of Labor Standards Enforcement or a court of law, for which no appeal is pending, for the violation of any wage order or provision of the Labor Code.	

Electronic Signature

☒ By signing, I affirm under penalty of perjury that the information herein is true and correct and that I am authorized by California law to sign.

Pankaj S Raval

05/24/2024

Signature

Date

EXHIBIT C: Fairness for Fire Victims Statement of Information
Changing Annual Report Filing Deadline from 8/21/24 to 5/31/26

History			
Collapse All			
Statement of Information 5/24/2024			
Amendment Type	Field Name	Changed From	Changed To
Statement of Information	Annual Report Due Date	8/21/2024 12:00:00 AM	5/31/2026 12:00:00 AM
Control ID	Labor Judgement		N
BA20241021241			
Date			
5/24/2024			
Image Download			
Download			

EXHIBIT D: Fairness For Fire Victims “Virtual Office”

DAVINCI

Find your virtual office

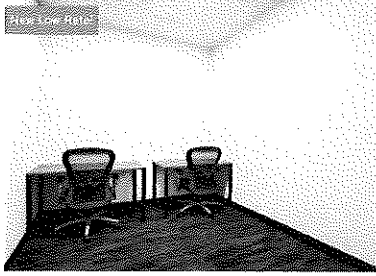
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500 Capitol Mall



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Suite 2350
Sacramento, CA 95814

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